

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

CITY OF HARRISBURG, PA

Debtor.

Chapter 9

Case No. 11-06938

**JOINDER OF NATIONAL PUBLIC FINANCE GUARANTEE CORPORATION IN  
OBJECTION BY THE COMMONWEALTH OF PENNSYLVANIA TO  
CHAPTER 9 PETITION OF THE CITY OF HARRISBURG**

National Public Finance Guarantee Corporation (“National”), a party in interest in the chapter 9 case of the City of Harrisburg (the “City”), respectfully submits this joinder to the Objection by the Commonwealth of Pennsylvania to the Chapter 9 Petition of the City of Harrisburg (the “Objection”), dated October 14, 2011 [Docket No. 15] and states as follows:

1. National joins in the Objection and incorporates the legal and factual arguments contained therein. For the reasons stated in the Objection, National requests that the Court dismiss this chapter 9 case for failure to satisfy the eligibility criteria set forth in 11 U.S.C. § 109(c)(2) and grant such other relief as it deems just and necessary.

2. National preserves the right to object to the chapter 9 petition of the City under any subsection of 11 U.S.C. § 109(c) as an Objecting Party as set forth in the Order Setting Objection and Briefing Deadlines and Scheduling Hearing, dated October 19, 2011 [Docket No. 42], including the right to be heard with respect to such objections at the hearing scheduled for November 23, 2011 or any continuance thereof.

Dated: October 28, 2011

Respectfully submitted,

Winston & Strawn LLP

By: /s/ Lawrence A. Larose  
Lawrence A. Larose, Esq.  
Samuel S. Kohn  
Sarah L. Trum, Esq.  
200 Park Avenue  
New York, NY 10166-4193  
Telephone: (212) 294-6700  
Facsimile: (212) 294-4700  
Email: llarose@winston.com  
skohn@winston.com  
strum@winston.com

*Attorneys for National Public Finance Guarantee  
Corporation*